

Message

From: Kipka, Undine [kipka.undine@epa.gov]
Sent: 9/19/2016 5:20:40 PM
To: Nerden, Joseph (DEP) [Joseph.Nerden@MassMail.State.MA.US]; Marian Rambelle [mrambelle@cdwconsultants.com]; Vakalopoulos, Catherine (DEP) [catherine.vakalopoulos@state.ma.us]; Papadopoulos, George [papadopoulos.george@epa.gov]; Harding, George [harding.george@epa.gov]; Borci, Todd [Borci.Todd@epa.gov]
CC: COUTU Clary [clary.coutu@keoliscs.com]; Bill Betters [bbetters@cdwconsultants.com]; kevin.blander@state.ma.us
Subject: RE: NPDES MA0003590 - CRMF Prison Point OWS effluent sampling conditions

Apologies for the delay in my reply --

I agree with Joe with regards to interim sampling procedure. It is my understanding that we would discuss a revision of the current interim sampling plan (i.e. have MBTA/Keolis propose a sampling plan, with representative locations) at the next site visit. The tentative date for the next site visit is Wednesday, October 12 (10/12) at 10am, which Clary is working on scheduling now.

If there are any questions remaining with regards to interim sampling, please copy me on the correspondence. Thanks!

Undine Kipka
(617) 918 1335

From: Nerden, Joseph (DEP) [mailto:Joseph.Nerden@MassMail.State.MA.US]
Sent: Friday, September 16, 2016 10:13 AM
To: Marian Rambelle <mrambelle@cdwconsultants.com>; Vakalopoulos, Catherine (DEP) <catherine.vakalopoulos@state.ma.us>; Papadopoulos, George <papadopoulos.george@epa.gov>; Kipka, Undine <kipka.undine@epa.gov>; Harding, George <harding.george@epa.gov>; Borci, Todd <Borci.Todd@epa.gov>
Cc: COUTU Clary <clary.coutu@keoliscs.com>; Bill Betters <bbetters@cdwconsultants.com>; kevin.blander@state.ma.us
Subject: RE: NPDES MA0003590 - CRMF Prison Point OWS effluent sampling conditions

Greeting all,

I'm unclear as to why sampling is still being performed at the OWS. During the meeting last month, referenced below, it was clear that more than 90% of flow bypasses the OWS and now connects directly to the three existing outfall pipes via the new GLX junction structure designated as MH 13.4. Sampling should be taken at the discharge location or an appropriate upstream location such as MH 13.4. MBTA's September 21, 2015, letter to EPA (see attached) states that there were sampling issues due to low flow during GLX dewatering activities. It did not address flows bypassing the OWS. I do not believe the MBTA has submitted a proposal to revise the NPDES sampling location as result of the completed GLX stormwater infrastructure improvements.

If flow (at this time) is insufficient to collect a dry weather sample (at an appropriate location), then NODI Code F would be acceptable. There is also a requirement for a monthly wet weather sample, which should be adhered to. We know rains have been infrequent, but there should be a sufficient response even during a small rain event (0.1 inch is identified in the permit) to do the wet weather sampling.

Joe

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From: Marian Rambelle [<mailto:mrambelle@cdwconsultants.com>]
Sent: Thursday, September 15, 2016 2:06 PM
To: Vakalopoulos, Catherine (DEP); Papadopoulos, George; Kipka, Undine; Nerden, Joseph (DEP)
Cc: COUTU Clary; Bill Betters
Subject: NPDES MA0003590 - CRMF Prison Point OWS effluent sampling conditions

Good afternoon all,

We'd like to follow up with you from our meeting last month at CRMF, regarding NPDES permit effluent sampling and potential insufficient flow conditions at the Prison Point OWS. As you know, the GLX project dewatering activities have been causing a decrease in the flows in the Prison Point OWS. We recall discussing at that time with some of you that, in the event there is insufficient water in the Prison Point OWS to conduct sampling, effluent samples will not be collected and that "Insufficient Flow for Sampling" (NODI Code F) will be indicated on the DMR.

We will plan to follow that approach, but would appreciate if you can confirm that when you have a chance. This situation could occur if a wet weather sampling opportunity presents itself on Sunday or Monday; unfortunately, wet weather sampling opportunities have been quite rare during the ongoing drought we're experiencing this quarter.

Thank you, and please let us know if you have any questions,

Marian

Marian Rambelle
Senior Environmental Engineer

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